May 9, 2025
Project No. 045163

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
Northeast Regional Office
150 Presidential Way
Woburn, MA 01801

Re: Tier II Classification Extension Submittal
50 Tufts Street
Somerville, Massachusetts
Mass DEP RTN 3-23246

Dear Sir/Madam:

On behalf of UniFirst Corporation (UniFirst) of Wilmington, Massachusetts, GEI Consultants, Inc. (GEI) prepared this Tier II Classification Extension Submittal for the site located at 50 Tufts Street in Somerville, Massachusetts (the Site; Figure 1). The Site is identified by Massachusetts Department of Environmental Protection (MassDEP) Release Tracking Number (RTN) 3-23246. The Site includes the 50 Tufts Street property (the Property), other properties in the neighborhoods east and immediately north, south, and west of the Property, and the Michael E. Capuano Early Childhood Center (Capuano Center) located at 150 Glen Street in Somerville, Massachusetts (Figure 2).

This Tier II Classification Extension Submittal was prepared in accordance with the Massachusetts Contingency Plan (310 CMR 40.0560(7)). The Tier Classification Transmittal Form (BWSC107) was submitted via eDEP, and a copy is in Appendix A.

1. Background and Site Description

From approximately 1955 to 2002, the Property was used for storage and distribution of industrial chemicals, laundry supplies, and dry-cleaning supplies. Chemicals stored at, and transported to and from the Property, included chlorinated volatile organic compounds (VOCs). These chlorinated VOCs – particularly tetrachloroethylene (also called perchloroethylene [PCE]), trichloroethylene (TCE), and 1,1,1-trichloroethane (TCA) – have been detected in soil, soil vapor, indoor air, and groundwater at the Property and are therefore the compounds of potential concern (COPCs) for the Site.

A release of chlorinated volatile organic compounds (VOCs) to soil and groundwater at 50 Tufts Street was originally reported to MassDEP in 2002 and assigned RTN 3-23246. In October 2004, the concentrations of PCE and TCE measured in the indoor air of the 50 Tufts Street building represented an Imminent Hazard (IH), and MassDEP assigned RTN 3-24358 to the release. Also in October 2004, the concentration of total VOCs in two wells located within 30 feet of residences triggered a MCP 72-hour

reporting requirement in accordance with 310 CMR 40.0313(4) and (5). MassDEP assigned RTN 3-24376 and required an Immediate Response Action (IRA) to evaluate the potential for a Critical Exposure Pathway (CEP) and/or a Condition of Substantial Release Migration (SRM).

On November 9, 2005, DEP issued a NOR to UniFirst and identified UniFirst as a potentially responsible party (PRP) for the 50 Tufts Street Site (RTNs 3-23246 and 3-24358 and 3-24376). Following indoor air testing at two downgradient residential properties, MassDEP assigned RTN 3-26114 to the reported release. For tracking, reporting and response action purposes, these RTNs have been consolidated under RTN 3-23246.

The detection of chlorinated VOCs in indoor air at some buildings within the Site required the implementation of an Immediate Response Action (IRA). The "Immediate Response Action Plan" associated with RTN 3-23246 was submitted to MassDEP on January 9, 2006 by GEI. The Site was classified as Tier IC (Permit No. W085813). The "Phase II Comprehensive Site Assessment (CSA), Method 3 Risk Characterization, and Phase III Remedial Action Plan (RAP)" (Phase II/III) for the Site was submitted to MassDEP on July 14, 2008. The "Phase IV Remedy Implementation Plan" (Phase IV RIP) was submitted to MassDEP on August 10, 2009. The "Immediate Response Action Completion Report and Remedial Monitoring Report No. 11" (IRAC Report) was submitted to MassDEP on November 13, 2009, and the "Immediate Response Action Completion Report Amendment" (IRAC Report Amendment) was submitted to MassDEP on April 1, 2011. The "Phase IV Final Inspection Report, Remedial Monitoring Report No. 15, and Phase V Remedy Operation Status Report," (Phase IV FIR/Phase V ROS) was submitted to MassDEP on August 4, 2011. The Site was reclassified as Tier II on August 1, 2014.

2. Transmittal Form [310 CMR 40.0560(7)(c)(1)]

Copies of the Tier II Classification Extension Transmittal Forms (BWSC107 and BWSC107B) are included with this submission in Appendix A.

3. Status of Response Actions and Proposed Plan and Schedule [310 CMR 40.0560(7)(c)(2)]

An approximate schedule for anticipated activities is presented below. Many of the activities are dependent upon property access, and we will continue to communicate with MassDEP and provide updates to the schedule as needed.

Compliance Category	Activity	Schedule
Tier Classification Extension	Submittal	May 2025
Phase II Addendum	Indoor Air Sampling at Passive EPMM Properties	Ongoing 2025
	Indoor Air Sampling at Properties Where Access Previously Refused	Summer/Fall 2025
	Subsurface Investigation	Summer 2025
Phase III Remedial Action Plan Addendum	Submittal	June 2026

Compliance Category	Activity	Schedule
Phase IV Remedy Implementation Plan Addendum	Submittal	August 2026
Permanent or Temporary Solution	Submittal	December 2026
Post Audit Completion Statement	Submittal	December 2026

Accordingly, additional time is needed to achieve a Permanent or Temporary Solution. Therefore, an extension of the Tier II Permit is warranted.

4. Certifications [310 CMR 40.0560(7)(c)(3) and (4)]

The certifications required by the MCP are provided on the BWSC107 form that was submitted electronically via eDEP (copy in Appendix A).

5. MCP Compliance [310 CMR 40.0560(7)(c)(5)]

The Site compliance history since the submittal of the August 2014 Tier II Classification is:

- Release Abatement Measure Completion Report for 34 Knowlton Street, dated October 2014.
- Phase V Status Report No. 7 and Remedial Monitoring Report No. 22, dated February 2015.
- Phase V Status Report No. 8 and Remedial Monitoring Report No. 23, dated August 2015.
- Memorandum from MassDEP – 50 Tufts Street (Release Tracking Number 3-23246): Review of Vapor Intrusion Investigations Southwest of the Massachusetts Bay Transportation Authority (MBTA) Line, dated October 2015.
- Phase V Status Report No. 9 and Remedial Monitoring Report No. 24, dated February 2016.
- Partial Permanent Solution Statement 31 Franklin Avenue, dated April 2016.
- Partial Permanent Solution Statement 6 Reed Court, dated June 2016.
- MassDEP Notice of Audit, dated June 2016.
- Phase V Status Report No. 10 and Remedial Monitoring Report No. 25, dated August 2016.
- Partial Permanent Solution Statement 80 Franklin Street, dated September 2016.
- Partial Permanent Solution Statement 74 Franklin Street, dated January 2017.
- Partial Permanent Solution Statement 82 Franklin Street, dated January 2017.
- Phase V Status Report No. 11 and Remedial Monitoring Report No. 26, dated February 2017.
- MassDEP Notice of Audit Findings, Audit Inspection, dated July 2017.
- Phase V Status Report No. 12 and Remedial Monitoring Report No. 27, dated August 2017.
- Partial Permanent Solution Statement 0 Franklin Street, dated September 2017.

- Partial Permanent Solution Statement 86 Franklin Street, dated October 2017.
- Partial Permanent Solution Statement 51-51A Tufts Street, dated November 2017.
- Partial Permanent Solution Statement 85 Washington Street, dated December 2017.
- Partial Permanent Solution Statement 53 Tufts Street, dated January 2018.
- Phase V Status Report No. 13 and Remedial Monitoring Report No. 28, dated February 2018.
- Release Abatement Measure Plan for 163 Glen Street, dated June 2018.
- Phase V Status Report No. 14 and Remedial Monitoring Report No. 29, dated August 2018.
- Release Abatement Measure Status Report No. 1 for 163 Glen Street, dated November 2018.
- Phase V Status Report No. 15 and Remedial Monitoring Report No. 30, dated February 2019.
- Partial Permanent Solution Statement 76 Franklin Street, dated May 2019.
- Release Abatement Measure Status Report No. 2 for 163 Glen Street, dated May 2019.
- Phase V Status Report No. 16 and Remedial Monitoring Report No. 31, dated August 2019.
- Release Abatement Measure Completion Report for 163 Glen Street, dated October 2019.
- Phase V Status Report No. 17 and Remedial Monitoring Report No. 32, dated February 2020.
- Phase V Status Report No. 18 and Remedial Monitoring Report No. 33, dated August 2020.
- Partial Permanent Solution Statement 163 Glen Street, dated January 2021.
- Phase V Status Report No. 19 and Remedial Monitoring Report No. 34, dated February 2021.
- Phase V Status Report No. 20 and Remedial Monitoring Report No. 35, dated August 2021.
- Phase V Status Report No. 21 and Remedial Monitoring Report No. 36, dated February 2022.
- Release Abatement Measure Plan for 31 Tufts Street, RTN 3-23246 and 3-37468, dated July 2022.
- Phase V Status Report No. 22 and Remedial Monitoring Report No. 37, dated August 2022.
- Release Abatement Measure Status Report No. 1 for 31 Tufts Street, RTN 3-23246 and 3-37468, dated January 2023.
- Phase V Status Report No. 23 and Remedial Monitoring Report No. 38, dated February 2023.
- Partial Permanent Solution Statement 90-102 Washington Street, dated March 2023.
- Release Abatement Measure Status Report No. 2 for 31 Tufts Street, RTN 3-23246 and 3-37468, dated May 2023.
- Release Abatement Measure Plan for 10 Morton Street, dated June 2023.
- Phase V Status Report No. 24 Remedial Monitoring Report 39, dated August 2023.
- Release Abatement Measure Modification and Status Report No. 1 for 10 Morton Street, dated November 2023.

- Release Abatement Measure Completion Report and Permanent Solution Statement for 31 Tufts Street, RTN 3-23246 and 3-37468, dated December 2023.
- Partial Permanent Solution 152-154 Glen Street, dated December 2023.
- Phase V Status Report No. 25 Remedial Monitoring Report 40, dated February 2024.
- Release Abatement Measure Plan for 121 Washington Street, dated November 2023.
- Release Abatement Measure Status Report No. 2 for 10 Morton Street, dated May 2024.
- Release Abatement Measure Status Report No. 1 for 121 Washington Street, dated July 2024.
- Phase V Status Report No. 26 Remedial Monitoring Report 41, dated August 2024.
- Release Abatement Measure Status Report No. 3 for 10 Morton Street, dated November 2024.
- Notification Requirements and Compliance Assistance Call, dated November 2024.
- MassDEP Notice of Audit Finding, Notice of Noncompliance, Termination of Remedy Operation Status, dated December 2024.
- Release Abatement Measure Status Report No. 2 for 121 Washington Street, dated January 2025.
- Arnold & Porter letter – RTN 3-23246 (50 Tufts Street, Somerville, Massachusetts) Notice of Audit Findings and Notice of Non-Compliance, dated January 2025.
- Phase V Status Report No. 27 Remedial Monitoring Report 42, dated February 2025.
- Arnold & Porter letter – RTN 3-23246 (50 Tufts Street, Somerville, Massachusetts) Notice of Audit Findings and Notice of Non-Compliance, dated February 2025.
- MassDEP– Somerville – 50 Tufts Street NOAF/NON, dated March 2025.
- Arnold & Porter letter – RTN 3-23246 (50 Tufts Street, Somerville, Massachusetts) Notice of Audit Findings and Notice of Non-Compliance, dated March 2025.
- MassDEP – Somerville – 50 Tufts Street NOAF/NON dated April 2024.

6. Licensed Site Professional (LSP) Opinion Regarding Continuing Response Actions [310 CMR 40.0560(7)(c)(6)]

The LSP opinion required by the MCP is provided on the BWSC107 form that was submitted electronically via eDEP (copy in Appendix A). As the LSP of Record for the Site, it is my opinion that this submittal to MassDEP is in conformance with the MCP (310 CMR 40.0000).

Please contact Ileen Gladstone at 781-424-9924 or at igladstone@geiconsultants.com if you have any questions regarding this Permit Extension Application.

Sincerely,

GEI CONSULTANTS, INC.

Ileen S. Gladstone, P.E., LSP
Senior Vice President

Christopher O. Coner, CHMM
Project Manager

Attachments

Figures
Appendix A MassDEP Transmittal Forms (BWSC107, BWSC107B)

c: Catherine Malagrida, UniFirst Corporation

MEF/ISG/COC:bdp
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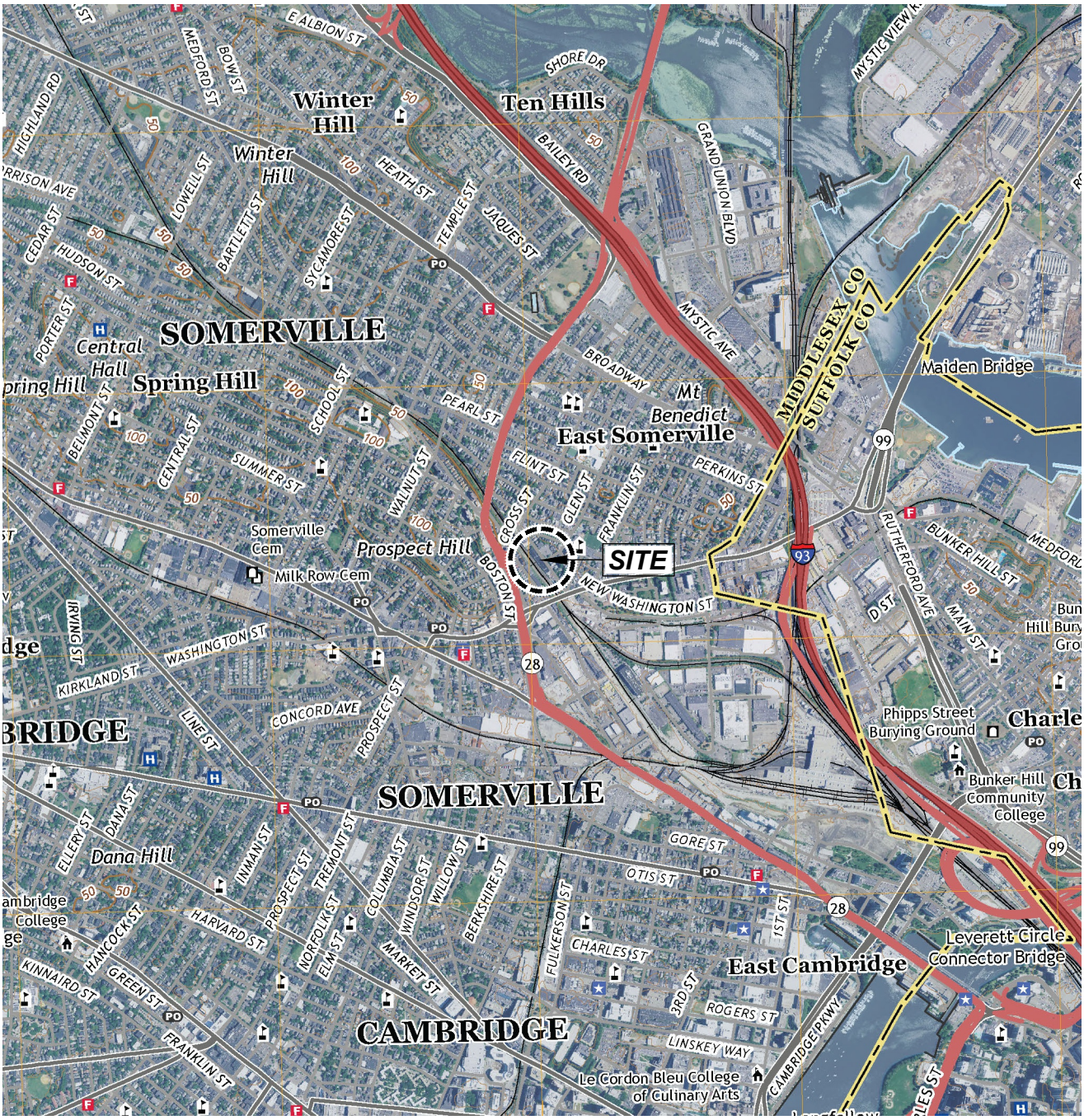
Figures

Figure 1 Site Location Map

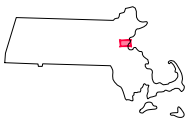
Figure 2 Disposal Site Map and Site Boundary



0 1000 2000 4000 6000

SCALE, FEET

This Image is from U.S.G.S. Topographic 7.5 Minute Series
Boston North, MA Quadrangle, 2018.
Datum is North American Vertical Datum of 1988 (NAVD88).
Contour Interval is 10 Feet.



MASSACHUSETTS
QUADRANGLE LOCATION

Tier Classification Extension 50 Tufts Street Somerville, Massachusetts	GEI Consultants	SITE LOCATION MAP
UniFirst Corporation Wilmington, Massachusetts	Project 04516-3	May 2025 Fig. 1

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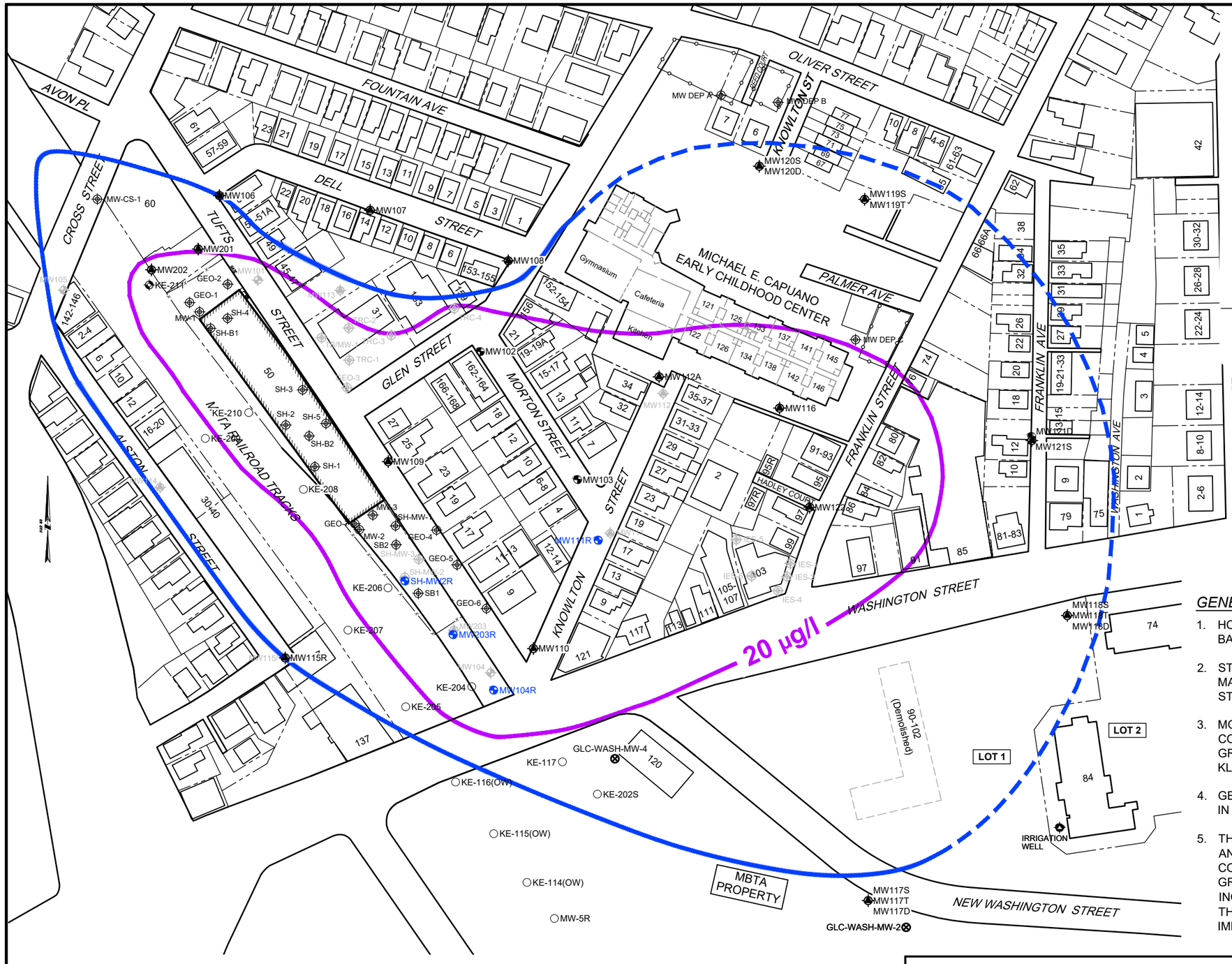

LEGEND:

- MONITORING WELL INSTALLED BY TRC, 2014
- BORING BY KLEINFELDER, MARCH 2014 AND APRIL 2014
- MONITORING WELL BY KLEINFELDER, SEPTEMBER 2012, MARCH 2014, AND APRIL 2014
- MONITORING WELL WITH SOIL VAPOR SAMPLE PORT INSTALLED BY GEI, JANUARY 2007 - JANUARY 2008
- MONITORING WELL INSTALLED BY GEI, MAY 2006
- MONITORING WELL INSTALLED BY GEI, MAY 2022, MARCH 2024, & OCTOBER 2024
- PREVIOUSLY INSTALLED IRRIGATION WELL
- GLXC WELL INSTALLED AUGUST 2020
- WELLS IN GRAY HAVE BEEN DESTROYED OR DECOMMISSIONED
- CHAIN LINK FENCE
- 138 ROOM NUMBER AT CAPUANO SCHOOL
- BOUNDARY OF COMMUNITY GARDENS
- 84 STREET ADDRESS
- MBTA = MASSACHUSETTS BAY TRANSPORTATION AUTHORITY
- DISPOSAL SITE BOUNDARY (DASHED WHERE INFERRED)
- EXTENT OF PCE CONCENTRATION IN SHALLOW GROUNDWATER GREATER THAN OR EQUAL TO 20 µg/l
- µg/l = MICROGRAMS PER LITER

GENERAL NOTES:

1. HORIZONTAL CONTROL FOR THIS PLAN WAS ESTABLISHED BY GPS AND IS BASED ON THE NORTH AMERICAN DATUM OF 1983.
2. STREET AND PROPERTY LINES BASED ON SOMERVILLE ASSESSORS' MAPS AND ARE BEST FIT RELATIVE TO THE LOCATION OF THE 50 TUFTS ST. BUILDING.
3. MONITORING WELL LOCATIONS AND ELEVATIONS, AND CAPUANO CENTER COMMUNITY GARDEN LOCATIONS WERE ESTABLISHED BY ON THE GROUND SURVEYS BY BSC GROUP, INC. OR INFORMATION PROVIDED BY KLEINFELDER.
4. GEI OBSERVED DECOMMISSIONING OF SH-MW1 AND SH-1 THROUGH SH-5 IN 2007.
5. THE 20 µg/l BOUNDARY LINE IS BASED ON SHALLOW GROUNDWATER ANALYTICAL RESULTS (0 TO 15 FEET BELOW GROUND SURFACE) COLLECTED THROUGH NOVEMBER 2022. KE-204 IS A WELL SCREENED GREATER THAN 15 FEET BELOW GROUND SURFACE, BUT HAS BEEN INCLUDED IN THE 20 µg/l BOUNDARY LINE BECAUSE OF UNCERTAINTY ON THE SHALLOW GROUNDWATER CONCENTRATIONS WITHIN THE IMMEDIATE VICINITY OF THIS WELL.

Tier Classification Extension
50 Tufts Street
Somerville, Massachusetts

UniFirst Corporation
Wilmington, Massachusetts

GEI Consultants

DISPOSAL SITE MAP AND SITE BOUNDARY

Project 04516-3 | May 2025 | Fig. 2

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Appendix A MassDEP Transmittal Forms (BWSC107, BWSC107B)

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

TIER CLASSIFICATION TRANSMITTAL FORM
Pursuant to 310 CMR 40.0500 (Subpart E)

BWSC 107

Release Tracking Number
3 - 23246

A. DISPOSAL SITE LOCATION:

1. Disposal Site Name: 50 TUFTS ST & PROP ACROSS THE ST

2. Street Address: 50 TUFTS ST

3. City/Town: SOMERVILLE 4. ZIP Code: 021454129

5. Coordinates: Latitude: N 42.38186 Longitude: W 71.08857

B. THIS FORM IS BEING USED TO: (check all that apply)

☐ 1. Submit a new **Tier Classification Submittal**, including a **Tier Classification Compliance History** (BWSC107B). Check the tier classification category:

☐ a. Tier I ☐ b. Tier II

c. Check all Tier I criteria that apply, pursuant to 310 CMR 40.0520(2):

☐ i. Groundwater is located within an Interim Wellhead Protection Area, Zone II, or within 500 feet of a Private Water Supply Well, and there is evidence of groundwater contamination by an Oil or Hazardous Material at the time of Tier Classification at concentrations equal to or exceeding the applicable RCGW-1 Reportable Concentration set forth in 310 CMR 40.0360.

☐ ii. An Imminent Hazard is present at the time of Tier Classification.

☐ iii. One or more remedial actions are required as part of an Immediate Response Action pursuant to 310 CMR 40.0414(2).

☐ iv. One or more response actions are required as part of an Immediate Response Action to eliminate or mitigate a Critical Exposure Pathway pursuant to 310 CMR 40.0414(3).

☐ d. Check here if including an **Eligible Person, Eligible Tenant, or Other Person Certification** (BWSC107D)

☐ 2. Submit a **Phase I Completion Statement** as per 310 CMR 40.0480.

If previously submitted, provide date _____
mm/dd/yyyy

☐ 3. Submit a **Phase II Scope of Work** as per 310 CMR 40.0834.

If previously submitted, provide date _____
mm/dd/yyyy

☐ 4. Submit a **Phase II Conceptual Scope of Work supporting a Tier Classification Submittal.**

☑ 5. Submit a **Tier Classification Extension Submittal** for Response Actions at a Tier Classified Site including the **Tier Classification Compliance History** (BWSC107B).

☐ 6. Submit a Tier Classification Transfer Submittal for a change in person(s) undertaking Response Actions at a Tier Classified Site including the **Tier Classification Compliance History** (BWSC107B) and the **Tier Classification Transferor Certification** (BWSC107C).

Proposed effective date of transfer : _____
mm/dd/yyyy

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B. THIS FORM IS BEING USED TO: (cont.)

☐ 7. Submit a **Revised Tier Classification Submittal.**
Check the revised Tier Classification Category. If the Tier Classification Category is not changing, indicate the current classification.

☐ a. Tier I ☐ b. Tier II

c. Check all Tier I criteria that apply, pursuant to 310 CMR 40.0520(2):

☐ i. Groundwater is located within an Interim Wellhead Protection Area, Zone II, or within 500 feet of a Private Water Supply Well, and there is evidence of groundwater contamination by an Oil or Hazardous Material at the time of Tier Classification at concentrations equal to or exceeding the applicable RCGW-1 Reportable Concentration set forth in 310 CMR 40.0360.

☐ ii. An Imminent Hazard is present at the time of Tier Classification.

☐ iii. One or more remedial actions are required as part of an Immediate Response Action pursuant to 310 CMR 40.0414(2).

☐ iv. One or more response actions are required as part of an Immediate Response Action to eliminate or mitigate a Critical Exposure Pathway pursuant to 310 CMR 40.0414(3).

☐ d. Check here if including an **Eligible Person, Eligible Tenant, or Other Person Certification** (BWSC107D)

☐ i. Check here if this Tier Classification Submittal relies upon a Phase I Report, conceptual Phase II Scope of Work, and Tier Classification previously provided to the Department, pursuant to 310 CMR 40.0570(4).

☐ 8. Provide a **Notice that an additional Release Tracking Number(s) is (are) being linked to this Tier Classified Site** (Primary RTN). Future response actions addressing the Release or Threat of Release notification condition associated with additional Release Tracking Numbers (RTNs) will be conducted as part of the Response Actions planned or ongoing at the Primary Site listed above. For a previously Tier Classified Primary Site, if there is a reasonable likelihood that the addition of the new secondary RTN(s) would change the classification of the site, a **Revised Tier Classification Submittal** must also be made.

Provide Release Tracking Number(s): a. ____ - ____ b. ____ - ____

All future Response Actions must occur according to the deadlines applicable to the Primary RTN. Use only the Primary RTN when making future submittals for this site unless specifically relating to response actions started before the linking occurred.

☐ 9. Provide voluntary information to MassDEP to facilitate potential Brownfields-related support. This data will be used by MassDEP for information purposes only, and does not represent or create any legal commitment, obligation or liability on the part of the party or person providing this data to MassDEP.

a. Are the response actions that are the subject of this submittal associated with the redevelopment, reuse or the major expansion of the current use of property(ies) impacted by the presence of oil and/or hazardous materials?
☐ i. Yes ☐ ii. No ☐ iii. I don't Know

b. Is the property a vacant or under-utilized commercial or industrial property ("a brownfield property")?
☐ i. Yes ☐ ii. No ☐ iii. I don't Know

c. Will funds from a state or federal brownfield incentive program be used on one or more of the property(ies) within the disposal site?
☐ i. Yes ☐ ii. No ☐ iii. I don't Know iv. If Yes, identify the program: ____

d. Has a Covenant Not to Sue been obtained or sought?
☐ i. Yes ☐ ii. No ☐ iii. I don't Know

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B. THIS FORM IS BEING USED TO: (cont.)

e. Check all applicable categories that apply to the person making this submittal:

- ☐ i. Redevelopment Agency or Authority
- ☐ ii. Community Development Corporation
- ☐ iii. Economic Development and Industrial Corporation
- ☐ iv. Private Developer
- ☐ v. Fiduciary
- ☐ vi. Secured Lender
- ☐ vii. Municipality
- ☐ viii. Potential Buyer (non-owner)
- ☐ ix. Other, describe:

This data will be used by MassDEP for information purposes only, and does not represent or create any legal commitment, obligation or liability on the part of the party or person providing this data to MassDEP.

C. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> *if Section B of this form indicates that a* ***Tier Classification Submittal*** *is being submitted,* this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> *if Section B of this form indicates that a* ***Phase I Completion Statement*** *is being submitted,* the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> *if Section B of this form indicates that a* ***Phase II Scope of Work*** *is being submitted,* the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> *if Section B of this form indicates that a* ***Tier Classification Extension Submittal*** *or a* ***Tier Classification Transfer Submittal*** *is being submitted,* the response action(s) that is (are) the subject of this submittal (i) has (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

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C. LSP SIGNATURE AND STAMP: (cont.)

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP#: 9719
2. First Name: ILEEN S
3. Last Name: GLADSTONE
4. Telephone: 781-721-4012
5. Ext.:
6. Email: IGLADSTONE@GEICONSULTANTS.COM
7. Signature:
8. Date: mm/dd/yyyy
9. LSP Stamp:

D. PERSON MAKING SUBMITTAL:

DRAFT COPY

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: UNIFIRST CORPORATION
3. Contact First Name: CATHERINE
4. Last Name: MALAGRIDA
5. Street: 68 JONSPIN RD
6. Title: ENV COMPLIANCE MANAGER
7. City/Town: WILMINGTON
8. State: MA
9. ZIP Code: 018871090
10. Telephone: 978-658-8888
11. Ext.:
12. Email: catherine_malagrida@unifirst.com

E. RELATIONSHIP OF PERSON MAKING SUBMITTAL TO DISPOSAL SITE:

☐ Check here to change relationship

☑ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter

☑ e. Other RP or PRP Specify: OTHER PRPS

☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ 4. Any Other Person Making Submittal Specify Relationship:

F. REQUIRED ATTACHMENT AND SUBMITTALS:

☐ 1. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

☐ 2. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of any Phase Reports to DEP.

☐ 3. Check here to certify that a copy of the Legal Notice of a Tier Classification or Re-classification Submittal is attached, and a cover letter and a copy of the notice is sent to the Chief Municipal Officer and the Local Board of Health pursuant to 310 CMR 40.0510(3) and 40.1403.

☐ 4. Check here to certify that the owner of a Public Water Supply has been provided written notice pursuant to 310 CMR 40.0510(3).

☑ 5. For a Tier Classification Extension Submittal, check here to certify that a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site is attached.

☐ 6. For a Tier Classification Transfer Submittal, check here to certify that a statement summarizing the reasons for the proposed change in person(s) undertaking the Response Actions is attached. All Response Actions must be completed by the deadline applicable to the person who first filed a Tier Classification Submittal for the Disposal Site.

☐ 7. Check here if any non-updatable information provided on this form is incorrect, e.g., Release Address/Location Aid. Send corrections to bwsc.edep@mass.gov.

☐ 8. Check here to certify that an IRA Completion is being, or has been submited to support a Tier Reclassification pursuant to 310 CMR 40.0520(3).

☑ 9. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.

DRAFT COPY

G. CERTIFICATION OF PERSON MAKING SUBMITTAL:

1. I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

If submitting a Tier Classification, Extension or Transfer, I also attest under the pains and penalties of perjury that (i) I/the person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar with the requirements of M.G.L. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the/those Licensed Site Professional(s) employed or engaged to render Professional Services for the disposal site which is the subject of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/that person's(s') or entity's(ies') understanding as to the estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial and legal ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other applicable requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is aware of the requirements in 310 CMR 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is made learn(s) that it/they is/are unable to proceed with the necessary response actions.

2. By: _____ 3. Title: ENV COMPLIANCE MANAGER

Signature

G. CERTIFICATION OF PERSON MAKING SUBMITTAL:(cont.)

4. For: UNIFIRST CORPORATION (Name of person or entity recorded in Section D) 5. Date: _____ mm/dd/yyyy

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section D.

7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. Email: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO $10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY):

DRAFT COPY

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

TIER CLASSIFICATION COMPLIANCE HISTORY
Pursuant to 310 CMR 40.0540 (Subpart E)

BWSC 107B

Release Tracking Number
3 - 23246

A. DISPOSAL SITE COMPLIANCE HISTORY SUMMARY:

☐ 1. Check here if a Tier Classification Compliance History of the person listed in BWSC107, Section D, was previously submitted, and there has been no change in that person's compliance history, or the person in Section D has no compliance history. If this box is checked, this section does not have to be completed.

2. List all permits or licenses that have been issued by the Department that are relevant to this Disposal Site:

Program	Permit Number	Permit Category	Facility ID
a. Air Quality	N/A	N/A	N/A
b. Hazardous Waste (M.G.L. c. 21C)	N/A	N/A	N/A
c. Solid Waste	N/A	N/A	N/A
d. Industrial Wastewater Management	N/A	N/A	N/A
e. Water Supply	N/A	N/A	N/A
f. Water Pollution Control/Surface Water	N/A	N/A	N/A
g. Water Pollution Control/Groundwater	N/A	N/A	N/A
h. Water Pollution Control/Sewer Connection	N/A	N/A	N/A
i. Wetland & Waterways	N/A	N/A	N/A

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3. List all other Federal, state or local permits, licenses, certifications, registrations, variances, or approvals that are relevant to this Disposal Site:

Issuing Authority or Program, or Documentation Type	Identification Number	Date Issued mm/dd/yyyy

☑ 4. Check here to certify that, if needed, a statement further describing the Compliance History of this Disposal Site is attached.

This statement must describe the compliance history of the person or entity named in BWSC107, Section D with the following: (1) DEP regulations; and (2) other laws for the protection of health, safety, public welfare and the environment administered or enforced by any other government agency. Such a statement should identify information such as: (1) actions relevant to the Disposal Site taken by the Department to enforce its requirements including, but not limited to, a Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), Notice of Intent to Take Response Action (NORA), and an administrative enforcement order; (2) administrative consent orders; (3) judicial consent judgements; (4) similar administrative actions taken by other Federal, state or local agencies; (5) civil or criminal actions relevant to the Disposal Site brought on behalf of the DEP or other Federal, state, or local agencies; and (6) any additional relevant information. For each action identified, provide the following information: (1) name of the issuing authority, type of action, identification number and date issued; (2) description of noncompliance cited; (3) current status of the matter; and (4) final disposition, if any.